

To Whom It May Concern:

My family and I relocated to Arizona in 2004 and two years later, we settled into our vision of a perfect small town community located in Florence, Arizona. Beyond the beautiful homes and vibrant neighborhoods, lies the nearby historic part of the Town of Florence, featuring a Main Street and quaint downtown. This area offers scenic beauty, miles of natural parkland, picturesque lakes; Offering a wide variety of activities and events, for every interest. We have enjoyed living in this community and our children have made relationships that we hope will last throughout their lifetime. A few months ago, I learned about the Curis Copper Project planning to operate an in-situ mining operation 1.5 miles away from our community. As a concerned resident and mother of three, I felt the need to educate myself as much as possible on the topic, in an effort to make an informed decision. Over the past few months, I have read numerous literatures distributed by Curis, Protect Our Water Our Future, and engaged in hours of on-line research. I also found it crucial to attend Town Council and Planning and Rezoning Meetings. My personal observations at these meetings and from watching the Curis Representatives after the fact is that they are trying to buy their way into Florence, with what I perceive as empty promises.

The situation as I see it now is Curis wants the Town Council/Commission to rezone the land, which would go against what the voters voiced at last year's election, in reference to our Town's Vision for the Future. In a recent article from the Florence Blade Tribune, the Town Council voiced disapproval for the project. In the meantime, Curis has been trying another avenue, pursuing The Arizona State Land Department, in an effort to mine using a significantly smaller operation on their rectangular parcel, which would still have high risks of polluting our drinking water with heavy metals, radiochemicals, and other contaminants such as arsenic, cadmium, lead, and mercury. As this pursuit is in progress, Curis presents the information in an effort to stronghold us, forcing us into a bad decision. At the most recent Planning and Rezoning Meeting on September 15, 2011, the room was full of residents wearing red to convey their "No Mining" message. On the other side, Curis supporters wore lime green cut-outs in the shape of Arizona, with the phrase "Support Jobs." I find it ironic as most jobs will be highly technical in nature, mostly machine operated, and the majority of the profits will benefit another country, Canada.

On Friday, September 23, 2011, I called the Arizona State Land Department and spoke with Joe Dickson ([jdixon@land.az.gov](mailto:jdixon@land.az.gov)). I communicated that the site where Curis is proposing an in-situ mining operation has not been mined in approximately forty-years. In addition, it was an underground mine, whereas they dug trenches, tunnels, and shafts to get the ore out of the ground. In the 1990's, BHP began a brief (approximately 3 months), very small-level (by comparison to their proposed operation) pilot test, that was deemed incomplete. As the price of copper dropped, the mining company walked away. I further explained my concerns of:

- acidification of groundwaters
- mobilization of potentially hazardous heavy metals
- disturbance of the groundwater table, mixing of groundwater aquifers and general disturbance of and atop the ore body
- destruction of habitat
- potential spills of acidic and metal bearing leachates upon the surface
- radiation risks (Recent EPA studies indicate that in-situ mining can enhance naturally occurring radioactive materials.)

In addition, I stated that in-situ leaching problems are not as visible as in an open-pit mining, problems can go undetected for years. According to research, I found in-situ leaching is not controllable, inherently unsafe, unlikely to meet "strict environmental controls", and is not an environmentally benign method of mining. As the nature of the mining system, the ore body must be in an aquifer which lies under the H<sub>2</sub>O table. This raises some very serious environmental questions. Escaping leaching solution from the leach area can contaminate the periphery around the mining zone with leached out elements. Spills, leaks, and mechanical errors plague in-situ mining. Restoration of ground water is a continual problem. The most critical part of the ISL process is to control the movement of the chemical solutions within the aquifer. Any escape of these solutions outside the ore zone is considered an exclusion, and can lead to contamination of surrounding ground water systems. Some of the most common causes of excursions, identified by international operations in the U.S. and across Europe, can be through old exploration holes that were not plugged adequately, plugging or blocking off the aquifer causing excess water pressure build up and breaks in bores, and failures of injection/extraction pumps. I added that the water from the mining location runs northwest, which begins distribution to Sun City and Parkside Anthem Areas, where there is a k-8 school educating about 1,000 students. From here it continues on to surrounding communities such as Magic Ranch, Copper Basin, etc.

Joe Dickson, Arizona State Land Department, acknowledged and validated my concerns, but stated, "My interest is the trust and the state trust lands." I further clarified by asking, "What about the people who live here? They will be drastically impacted by the poisoned water that flows northwest. These chemicals have been linked with many negative health issues, such as cancer." Again, Mr. Dickson said, "My interest is the trust and the state trust lands." As a tax-paying resident to Arizona, I was appalled by his response.

The next phone call I made was to the Mining Unit of the Department of Environmental Quality at 1-602-771-4578. I spoke with Maribeth Greenslade ([mq3@azdeq.gov](mailto:mq3@azdeq.gov)) about my previous phone call to Joe Dickson, including his comments, and the concerns pertaining to this project. She stated that "mining is never perfect". In addition, I learned that the department "honors applications on their merits", that they monitor the water quality section of the mining operation, as the EPA monitors the injection wells and pond. I communicated to her an observation whereas of Robert Cluff, Executive VP of Technical Services, from Hunter-Dickinson assisted with collecting the data that was submitted. According to the state, they look at the practice of geology and legally they can use people within their company. I asked if anyone from the State of Arizona also collected soil samples and compared the data submitted by Curis. She responded, "No, they are not monitored by the state." Adding, they "Do not have the resources available to monitor or visit the sites." The Arizona Department of Environmental Quality goes by the information based on the permit documentation. I further questioned, asking if it was possible for Curis to submit false soil samples. She replied, "If someone wanted to they could submit a false sample." Adding, there were repercussions for this type of activity. However, if the state is not performing comparison samples, the damage would be long underway before it was documented. On related note, if you visit [www.hdmining.com](http://www.hdmining.com), you'll notice that they have subsidiary companies. One of them is Curis Resources, LTD. However, in public statement, they claim to not be affiliated? According to research, the larger, experienced mining operation (HD) can not be held responsible when our water source is polluted. In response to my concerns, she directed me to Christine Silva ([cs4@azdeq.gov](mailto:cs4@azdeq.gov)), with the Records Management Center, as on September 7, 2011, the department sent a letter to Curis detailing many concerns/questions that would need to be answered. She added that I would need to know the Inventory Number for the FCP, 101704, and the LTF License Number, 52202. I sent an e-mail to Christine and am awaiting her response to my public records request. In addition the FCP is

assigned an engineer, a hydrologist, and a project manager. Their information is as follows:

Project Manager: Richard Mendolia, [rjm@azdeq.gov](mailto:rjm@azdeq.gov), 1-602-771-4374

Supervisor: Vimal Chauhan, [vc2@azdeq.gov](mailto:vc2@azdeq.gov), 1-602-771-4362

I asked Maribeth to explain the process of permit issuance, as I am not familiar with the procedure. In January of 2011, Curis submitted an application to ADEQ to amend existing Aquifer Protection Permit. In March of 2011, the technical review process began Curis submitted a separate application to the EPA to transfer with amendments the Underground Injection Control Class 3 from BHP to Florence Copper Inc. It should also be noted that the APP and UIC were previously granted in 1997 after a very small, in-conclusive test pilot was conducted. I learned that after the technical review, they will issue a public notice, for a Public Hearing, in a high profile newspaper such as: The Arizona Republic, Business Gazette, or Daily Tribune. In addition, they will have the information posted on the AZDEQ website. At this hearing, they will hear comments from the public and respond to them in writing. I asked if they would have the hearing in Florence, at a time when most residents had the ability to attend. However, I learned that: "ADEQ accepts written statements, arguments, data, and views on the proposed delegation agreement that are received within 30 days after the date of the publication of this notice in the *Register* by 5:00 p.m. or postmarked not later than that date. After the conclusion of the public comment period and hearing, if any, the agency shall prepare a written summary responding to the comments received, whether oral or written. The agency shall consider the comments received from the public in determining whether to enter into the proposed delegation agreement. The agency shall give written notice to those persons who submitted comments of the agency's decision on whether to enter into the proposed delegation agreement. ADEQ is committed to complying with the Americans with Disabilities Act. If any individual with a disability needs any type of accommodation, please contact ADEQ at least 72 hours before the hearing at (602) 771-2300 or TDD (602) 771-4829 or contact us via the web at [azdeq.gov](http://azdeq.gov)."

In conclusion, I will continue to educate others about the dangers this project poses to our community and surrounding communities in terms of our water source becoming contaminated. I urge all to write an e-mail or make a phone call to our elected officials and agencies informing them of our opposition to this project. In addition, there is a second Planning and Rezoning Meeting on Thursday, October 6, 2011 at the Florence Town Hall. Let's show our true colors by wearing red

to oppose this operation. Thank you in advance for your time as it is greatly appreciated.

Sincerely,

Tara Walter